

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

IN RE:	§	Chapter 13
Horacio Hernandez	§	Case No. 19-31771-hcm
<i>dba Top Rank Transport</i>	§	
and Spouse,	§	
Aracely Hernandez	§	
aka Aracely Hernandez Reyes	§	
aka Aracely H. Reyes	§	
<i>Debtor</i>	§	

**TRUSTEE’S OBJECTION TO CONFIRMATION
OF CHAPTER 13 PLAN**

To the Honorable H. Christopher Mott, United States Bankruptcy Judge:

STUART C. COX, Standing Chapter 13 Trustee (“Trustee”), objects to Confirmation of the Debtors’ proposed Chapter 13 Plan and alleges:

1. Trustee objects to confirmation insofar as the Debtors’ plan extends beyond sixty (60) months in violation of 11 U.S.C. § 1322(d).

Relief Sought

Trustee prays for an Order Denying Confirmation of the proposed Chapter 13 Plan without prejudice to amend within fourteen (14) days of hearing, or in the alternative, that the instant case be dismissed, and that the Court grant the Chapter 13 Trustee such other, additional and further relief to which he may be justly entitled.

Respectfully submitted,
/s/Stuart C. Cox
Stuart C. Cox
Standing Chapter 13 Trustee
SBN: 00794992
/s/Lucille Zavala
Lucille Zavala
Senior Staff Attorney for Stuart C. Cox
SBN: 22251370
1760 N. Lee Trevino Drive
El Paso, TX 79936
(915) 598-6769 telephone

(915) 598-9002 facsimile

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing *TRUSTEE'S OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN* was served upon the parties listed below by United States Mail, first class, postage prepaid on December 11, 2019.

U.S. Trustee's Office
P.O. Box 1539
San Antonio, TX 78295-1539

Horacio Hernandez
Aracely Hernandez
10914 Pelhem Rd.
El Paso, TX 79936

Miguel Alejandro Flores
Edgar J. Borrego
Tanzy & Borrego Law Offices
2610 Montana Ave.
El Paso, TX 79903

PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

/s/Stuart C. Cox
/s/Lucille Zavala